

In Regard to
the open call for comments concerning 17-108

“Promoting Internet Freedom”

As a small business owner (Multifreq LLC – DUNS# 08-035-5032) I am deeply concerned by the comments made by the Commission on 18 May 2017 concerning the proposal to reclassify the Internet Service Providers from a utility style provider to an information provider.

My small business utilizes an ISP for the express purpose of gaining broadband access to the Internet. I do not use or desire any of the additional information services made available to me by the ISP. I am able to provide my own DNS services, I have my own domains, and I do not use any offered email or web services provided by my ISP. If I were to desire any additional information services such as QOS policing or DDOS mitigation services I would contract those services with the ISP as a separate service, or seek an upstream provider to competitively provide that type of service.

These additional information services are things I can either choose to provide to myself by running my own servers, or I can easily bypass my local ISP to competitively obtain those same information services from information service providers like Amazon Web Services or Google (as two such examples).

I also utilize the local cable service provider as they are the only option I have due to availability and lack of sufficient bandwidth limitations of competitors such as ADSL which is unavailable to me due to the distance and quality of the cables in the street. I am, therefor a captive user of the ISP that I use simply due to the technical limitations of any other potential competitors. This issue alone is one of the reasons that I believe there are regulations to protect the desires of consumers.

I believe that by defining the ISP's as pure information providers without regard to the basic service similarities they share with utilities could, and is harming my small business by either running afoul of their AUP when I run my own services, or through increasing my costs as a small business to cover the cost of the shared services they offer, services I have no current desire to utilize. As an Example I am currently paying CenturyLink for DSL at a new store location for internet access and I am being asked to pay an additional \$25 charge for their “Office Plus” service (Microsoft office bundle) and a charge of \$45 for their “Business

Bundle” above and beyond their \$95/month Broadband Access, which they are telling me automatically come as part of their DSL access. This is a harm to my small business of \$70 for services I do not want or use.

I would strongly recommend that the FCC commissioners reconsider looking at this as an “all or nothing” proposal. No ISP is purely a utility, however their utility services should not be thrown to the wayside when attempting to redefine them as a full-service provider.

I would request that the FCC retain the current status of the ISP regulations and instead of throwing the baby out with the bathwater encourage the local ISP’s to divide their services between basic internet access as a utility, and form a complimentary and competitive portfolio of services to be made available to their customers, if they so desire, they could even compete with other service providers on the open market to enhance the basic connectivity that their regulated arm offers.

The comments made that the existing regulations are cumbersome and do not reflect the current technology implies that the Commission should get busy with honestly updating and correcting those regulations rather than trying to offer a quick fix of simply bypassing them all together.

I appreciate the efforts of both the staff, and the commissioners to openly and honestly evaluate these comments and suggestions.

Bryce Alexander
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